

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MARCEL LEHEL LAZAR

a/k/a "GUCCIFER"

a/k/a "GUCCIFER SEVEN"

a/k/a "MICUL FUM"

a/k/a "MARCEL LAZAR LEHEL"

Defendant.

Criminal No. 1:14-CR-213

The Honorable James C. Cacheris

AGREED PROTECTIVE ORDER

Upon motion of the government, and with the agreement of the Defendant MARCEL LEHEL LAZAR, by and through his counsel, it is hereby

ORDERED THAT pursuant to its obligations under Part I of the Court's Discovery Order, the United States shall produce to defense counsel electronic copies of electronic communications by alleged victims, law enforcement reports that name alleged victims, and evidence the United States must produce as part of its discovery obligations that contains financial and personally identifiable information ("PII"). Such information will be marked "UNDER PROTECTIVE ORDER."

It is further ORDERED that as used in this Order, PII includes bank account numbers, credit card numbers, Social Security numbers, birth dates, names of victims or their family members, home addresses, telephone numbers, and any other information that, in combination with any other non-personally identifying information, would serve to identify an individual.

It is further ORDERED that defense counsel shall be responsible for maintaining the marked discovery materials provided by the government in a secure manner. Specifically, when not in use, the marked materials shall be maintained in a secure room, safe, file drawer, or cabinet. For purposes of this Order, the marked materials are “in use” if defense counsel is traveling or otherwise away from the office and has taken the marked materials with him or her for work on the case.

It is further ORDERED that access to the marked materials shall be restricted to persons authorized by this Order, namely:

- a. the attorneys of record, and
- b. attorneys, paralegals, investigators, experts, and legal assistants employed by or working with the attorneys of record and performing work in connection with their representation of the Defendant in this case.

Consistent with the Court’s Discovery Order, defense counsel may review the marked materials with the Defendant but cannot provide a copy of the materials to him.

It is further ORDERED that the following restrictions are placed on defense counsel, the Defendant, and the above-designated individuals, unless and until further ordered by the Court. Defense counsel, the Defendant, and the above-designated individuals shall not:

- a. disclose any of the information contained in the marked materials unless the disclosure is reasonably and in good faith calculated to aid defense counsel in the interview or examination of a witness;
- b. allow copies of the marked materials to leave the control of the above-designated individuals; or
- c. permit others to make copies of the marked materials.

It is further ORDERED that upon conclusion of this case, defense counsel and the above-designated persons shall keep the materials secure until after the last appeal is final. At the conclusion of the litigation of the case, and at the request of the government and consistent with

the ethical responsibilities of defense counsel, all marked materials and reproductions thereof shall be returned to the U.S. Attorney's Office.

Date: 4/27/16
Alexandria, Virginia

a

/s/

James C. Cacharis
United States District Judge

We ask for this:

Dana J. Boente
United States Attorney

/s/ Maya D. Song
 Maya D. Song
 Jay V. Prabhu
 Assistant United States Attorneys

Seen and Agreed:

/s/ Shannon S. Quill
Shannon S. Quill
Assistant Federal Public Defender
Counsel for Defendant Marcel Lazar